

VIA ECF

August 8, 2023

Honorable Christine P. O'Hearn, U.S.D.J.  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets, Courtroom 5A  
Camden, NJ 08101

Re: Brian McBride, et al. v. NJ Pen Civil Action No. 1:23-cv-02044-CPO-AMD

Your Honor:

The Plaintiffs are in receipt of the Court's text order which states:

"Set/Reset Hearings: Settlement Conference set for 8/22/2023 at 1:00 PM in Camden - Courtroom 5D before Judge Christine P. O'Hearn. (hem, ) (Entered: 08/01/2023)"

Plaintiff McBride has taken the day off of work. Plaintiff Blissick previously asked this court to appear virtually as reasonable accommodation (ECF 25). The grounds of disability was, and still is, post-traumatic stress disorder. For Plaintiff Blissick being in Camden and/or Collingswood cause her disabling flashbacks to the August 3, 2020 incident and events in Camden related thereto. Plaintiff Blissick has been under the care of a therapist ever since. The Court, having reviewed the previous request for a reasonable accommodation, then ordered Plaintiff McBride to appear in person, but allowed Plaintiff Blissick to appear remotely (See ECF 28).

Plaintiff Blissick asks this Court to please grant this accommodation for the same reason.

In addition to the request on the grounds of a reasonable accommodation on the basis of disability, Plaintiff Blissick runs her own business at the Jersey shore. The college students in her employ will have returned to school. The students on work visas from other nations (known colloquially as "J-1's) are ending their allowed time to work. Ms. Blissick even reached out to former employees to see if anyone was available to cover.

If the accommodation on the grounds of disability are not granted, Plaintiff Blissick, in addition to the anxiety associated from an in person appearance, will be forced to close her business. Closing her breaches her lease with the landlord. The landlord owns the property where all three of Plaintiff Blissick's locations operate and as such would have disastrous consequences not only on Plaintiff Blissick's business, but also worsen her disability.

The Court granted the request in the past and we ask for it to be continued herein.

Very truly yours,



Brian McBride  
Plaintiff



Deborah Blissick  
Plaintiff